

25 MAR 1988
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EPA Region 5 Records Ctr.



356904

Duane C. Helmberger, PE
Deputy Director
Environmental Planning Division
Department of the Air Force
Regional Civil Engineer-Central Region
1114 Commerce Street
Dallas, Texas 75242

Dear Mr. Helmberger:

The Region V Office of the U.S. Environmental Protection Agency (USEPA) has reviewed the Installation Restoration Program (IRP) Quality Assurance Project Plan (QAPP) for Scott Air Force Base.

The current QAPP which we have reviewed contains several deficiencies which necessitate further attention before any field work can begin. The deficiencies should be addressed prior to final approval of the QAPP. Our comments on the document are outlined below.

I. Title Page

A provision for the signature of the EPA Remedial Project Manager and the EPA Quality Assurance Officer should be made.

II. Project Description

1. A summary of the historical data for the site should be provided. Tables may be used for this purpose.
2. Specific target compounds and parameters should be identified.
3. Data usage statements for laboratory analyses and field measurements are missing; include data usages for all sampling parameters in this section. In addition, include photoionization detection (HNU), organic volatiles analysis (OVA), and mercury vapor measurements.
4. A sampling network and rationale for sampling locations must be included in this section. Summary tables of the total number of samples for each analytical parameter or group of parameters to be collected should be included as well as site maps or diagrams with sampling locations. Workplan references are acceptable if they are specific and QAPP reviewers have access to these documents.

5. The inclusion of a project time schedule is necessary; a bar chart is acceptable.
6. A clarification and explanation of the "fuel spill, fire training area and landfill" protocols for sampling analyses in Section 1.2.2 (p. 1-4) is necessary. These explanations should appear in Section 1.8 or in a QAPP attachment.

III. Project Organization and Responsibility

1. In this section, EPA responsibilities for project management and QAPP review must be clearly delineated. EPA responsibilities for performance and system audits made by the Contract Project Management Section (CPMS) and the Central Research Lab (CRL) must also be clarified.
2. In Table 4 it is indicated that at least one GC/MS method will be needed on samples for the site. Please identify the party responsible for Tentatively Identified Compound (TIC) review.
3. It should be stated in Section 1.3, since it is already stated in the Laboratory QA Plan (Section 4.0) that Weston is the responsible party for sample collection.

IV. Quality Assurance Objectives

Please replace references to the "current IFR" with the "current SOW."

V. Sampling Procedures

1. An explanation of the unique sample numbering system that includes provisions for blank and replicate samples is necessary.
2. There is no provision for collection of extra volumes for Volatile Organic Compounds (VOC) and extractable organic Metric Spike/Metric Spike Duplicate (MS/MSD) samples. Three times the normal volumes for VOC's and double the normal volume for extractable organic water samples must be collected. This applies to Section 1-10 of the QAPP as well.
3. The Weston Standard Operating Procedure (SOP) on page 4-2 includes an acetone rinse during decontamination. Please correct this to methanol and air drying for equipment used for organic samples as mentioned on page 2-13 of the QAPP.
4. Please correct the cyanide preservation procedure in Table 7, page 2-15, to a pH > 12.

5. Please note Region V guidelines on sampling of metals; ground water metals samples are to be collected in the field filtered form, while surface waters, residential well waters, or other water associated with drinking water sources should be unfiltered.

VI. Sample Custody

Provisions for a final evidence file, describing its contents and who has the responsibility for its maintenance must be included in the QAPP.

VII. Calibration Procedures and Frequency

Please discuss field calibration procedures and frequencies for the "HNU" and mercury vapor monitoring activities.

VIII. Performance and System Audits

Note that Contract Project Management Section of our Central Regional Laboratory has responsibility for external system audits for the USEPA, Region V. Please make provisions for this audit in Section A 1.11, page 1-37 of the QAPP.

IX. Data Reduction, Validation and Reporting

1. This section was omitted from the QAPP and has been confused with Section 1.13 (Specific Routing Procedures Used to Assess Data Precision, Accuracy and Completeness). Add the Data Reduction, Validation and Reporting Section to the QAPP.
2. Describe the procedures used to reduce, validate and report the data under this heading.

X. Specific Routing Procedures Used to Assess Data Precision, Accuracy and Completeness

Specify how precision, accuracy and completeness are to be assessed. Examples of this QAPP element could include the use of duplicate results, spike recoveries, and valid versus total expected data.

IX. Preventative Maintenance

Please include the "HNU" and field mercury monitoring device under Section 1.12.2.

We appreciate the opportunity to review this document. If you have any questions concerning our comments, please feel free to contact me at 312/ 886-7500.

Sincerely yours,

Original signed by:
William D. Franz

William D. Franz, Chief
Environmental Review Branch
Planning and Management Division

cc: Ken Miller, IEPA

bcc: James Adams, 5SQA

FRANZ/Disk #6/hk

ERB
W.D. Franz
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